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MAUREEN GREENSTONE, individually, and
as Appointed Guardian of SETH DALE
GREENSTONE, an Adult Protected Person

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA (LAS VEGAS)**

MAUREEN GREENSTONE, individually, and
as Appointed Guardian of SETH DALE
GREENSTONE, an Adult Protected Person,

Plaintiffs,

vs.

LAS VEGAS METROPOLITAN POLICE
DEPARTMENT; VIDAL CONTRERAS; DOES
1-10, inclusive,

Defendants.

Case No. 2:23-cv-00290-GMN-NJK

**SECOND STIPULATION AND
[PROPOSED] ORDER EXTENDING TIME
FOR OPPOSITION AND REPLY BRIEFS
RELATED TO DEFENDANTS' PENDING
MOTIONS FOR SUMMARY JUDGMENT**

The parties stipulate and agree to the following:

1. On April 29, 2024, VIDAL CONTRERAS filed a motion for summary judgment. Dkt. 52. The deadline for Plaintiffs to respond to CONTRERAS' motion is June 21, 2024.

2. On May 1, 2024, LVMPD filed a motion for summary judgment. Dkt. 56. The deadline for Plaintiffs to respond to LVMPD's motion is now June 21, 2024.

3. The deadline for Defendants' reply briefs is July 22, 2024. (Dkt. 63.)


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2 4. Local Rule IA 6-1 governs the parties' stipulation and request. Plaintiffs'
3 counsel is requesting a one-week extension because he is co-counsel on Lawrence v.
4 LVMPD, Case No. 2:16-cv-03039-APG-NJK, that is set for trial on June 17, 2024, before
5 Hon. Andrew Gordon that is expected to take one week. Likewise, counsel for
6 Defendants is preparing for a trial before District Court Judge Richard F. Boulware in
7 *Gomez v. LVMPD* scheduled to begin on July 29, 2024.

8 5. The parties stipulate and agree that good cause exists to extend the
9 deadlines for Plaintiffs to file responses to the Defendants' summary judgment motions
10 by one week and likewise to extend the deadline for Defendants' reply briefs from July
11 22, 2024, to July 29, 2024.

12 6. For these reasons, the parties respectfully request that the Court extend the
13 briefing deadlines as follows: Plaintiffs' response to both Defendants' motions for
14 summary judgment will become due on June 28, 2024, and Defendants' replies will
15 become due on July 29, 2024.

16 7. The parties stipulate and agree that this extension will not unnecessarily
17 delay resolution of this case. The extension will ensure that the parties can prepare
18 adequate briefs for the Court to make a ruling on the merits.

19
20 IT IS SO ORDERED.

21
22 
23 UNITED STATES DISTRICT JUDGE

24
25 DATED: June 17, 2024

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2
3 DATED this 16th day of June 2024.

4 PETER GOLDSTEIN LAW CORP

5
6 /s/ Peter Goldstein

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